

# **EXHIBIT E**

LAURENCE HUEN  
IN RE TELESCOPES ANTITRUST LITIGATION

November 09, 2023

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1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA  
3 SAN JOSE DIVISION

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5 IN RE TELESCOPES ANTITRUST :  
6 LITIGATION :  
7

8 This Document Relates to: :  
9

10 SPECTRUM SCIENTIFICS LLC, RADIO CITY, :  
11 INC., and those similarly situated, :  
12

13 Plaintiffs, :  
14

15 vs. :  
16

17 :No.  
18 :5:20-cv-03642-EJD

19 CELESTRON ACQUISITION, LLC, SUZHOU SYNTA :  
20 OPTICAL TECHNOLOGY CO., LTD., SYNTA CANADA:  
21 INT'L ENTERPRISES LTD., SW TECHNOLOGY :  
22 CORP., OLIVON MANUFACTURING CO. LTD., :  
23 OLIVON USA, LLC, NANTONG SCHMIDT :  
24 OPTO-ELECTRICAL TECHNOLOGY CO. LTD., :  
25 NINGBO SUNNY ELECTRONIC CO., LTD., PACIFIC:  
TELESCOPE CORP., COREY LEE, DAVID SHEN, :  
SYLVIA SHEN, JACK CHEN, JEAN SHEN, JOSEPH :  
LUPICA, DAVE ANDERSON, LAURENCE HUEN, AND :  
DOES 1-50, :  
:

26 Defendants. :  
27

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29 DEPOSITION OF LAURENCE HUEN

30 November 9, 2023

31

32 Job No. J10403984

33 Stenographically reported by:  
34 LAURA AXELSEN, CSR NO. 6173  
35 RMR, CCRR, CRR, CRC, RDR

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1                   VIDEOGRAPHER: Good morning. We are now  
2 on the record. Today is November 9th, 2023. Time  
3 on the screen is 10:04 a.m. My name is Kevin  
4 McMahon. I am the legal videographer and the  
5 court reporter today is Laura Axelsen.

6                   We're both here representing Esquire  
7 Deposition Solutions. This is the beginning of  
8 Media Unit 1 for the deposition of Laurence Huen  
9 regarding Telescopes Antitrust Litigation. The case  
10 numbers are 520CV03639EJD and 520CV03642EJD. We are  
11 located today at BraunHagey, 351 California Street,  
12 10th Floor, San Francisco, California 94104.

13                  Counsel, would you please identify  
14 yourselves for the record beginning with the  
15 noticing attorney.

16                  MR. BIEDERMANN: Yes, this is Garrett  
17 Biedermann of BraunHagey Borden LLP, here  
18 representing the plaintiffs. I am joined -- so,  
19 first of all, I am attending the deposition remotely  
20 via Zoom. In the deposition room with the witness  
21 are my colleagues Katie Kushnir and Bryn  
22 Treloar-Ballard, and I will be joined later in  
23 person by my colleague Matt Borden also of  
24 BraunHagey & Borden LLP.

25                  MR. FROST: Christopher Frost of Frost

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1 A. The box on the right-hand side?

2 Q. In the center, I believe.

3 A. Center --

4 Q. Under investment relationship.

5 A. Oh, SW Technology. Okay. Okay.

6 Q. And that's the entity that, to your  
7 knowledge, you're a consultant for; is that right?

8 A. Yes.

9 Q. And it's accurate that SW Technology is a

10 100 percent owner of Celestron?

11 A. Yes.

12 Q. There are two boxes listed above SW  
13 Technology in this organizational chart. Do you see  
14 that?

15 A. Yes.

16 Q. And one of those is Synta Canada; is that  
17 right?

18 A. Yes.

19 Q. Says that Synta Canada has a 15 percent  
20 interest in SW Technology. Do you see that?

21 A. Yeah, I saw it.

22 Q. To your knowledge, is it correct that  
23 Synta Canada has a 15 percent ownership interest in  
24 SW Technology?

25 A. I don't know. I can't answer question on

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## CERTIFICATE

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3 I, the undersigned, a Certified Shorthand  
4 Reporter, State of California, hereby certify that  
5 the witness in the foregoing deposition was by me  
6 first duly sworn to testify to the truth, the whole  
7 truth, and nothing but the truth in the  
8 within-entitled cause; that said deposition was  
9 taken at the time and place therein stated; that the  
10 testimony of the said witness was reported by me, a  
11 disinterested person, and was thereafter transcribed  
12 under my direction into typewriting; that the  
13 foregoing is a full, complete, and true record of  
14 said testimony; and that the witness was given an  
15 opportunity to read it and, if necessary, correct  
16 said deposition and to subscribe the same.

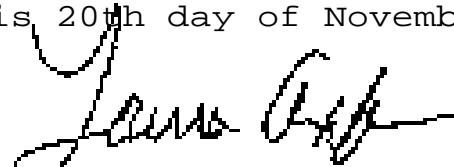
17

I further certify that I am not of counsel  
or attorney for either or any of the parties in the  
foregoing deposition and caption named, nor in any  
way interested in the outcome of the cause named in  
said caption.

22

Executed this 20th day of November, 2023.

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LAURA AXELSEN, C.S.R. 6173

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